

APPLIED DIVING SERVICES, INC.

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DEPARTMENT OF TRANSPORTATION

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DOCKET SECTION

15 September, 1998

Docket Management Facility [USCG-1998-37861 -24
U.S. Department of Transportation, Room PL-40 1
400 Seventh Street SW
Washington, DC 20590-000 1

Re: Advanced Notice of Proposed Rulemaking; Docket USCG- 1998-3786
Commercial Diving Operations; 46 CFR 197

Applied Diving Services is an active and concerned member of the Association of Diving Contractors, (ADC), and wishes to encourage the U.S. Coast Guard to accept and implement the changes and revisions to 46 CFR 197 as submitted by the ADC.

The ADC comments and recommendations, to be submitted directly by that organization in response to Questions 1 – 14 of ANPRM, Docket Ref: USCG-1998-3786, have been carefully reviewed by my entire staff. It is our opinion that the questions raised by the U.S. Cost Guard have been answered in a manner to promote greater safety in the commercial diving industry. We further believe that adoption and implementation of the ADC recommendations to be appropriate to current Cost Guard initiatives involving “Partnering Through People and Industry”.

I also strongly recommend that the ADC Consensus Standards of commercial Diving Operations, to be revised to reflect decisions made with regard to response to reference ANPRM, be, as a minimum, quoted in the resulting rulemaking document as a primary reference for the conduct of commercial diving. My dive crews live out of this publication, (or because of this publication), and I urge the Cost Guard to adopt the ADC Consensus Standards for Commercial Diving Operations as the United States National regulation.

Respectfully submitted,



Don Sutton
Vice President

CC: Ross Saxon, Association of Diving Contractors